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Arizona Corporation Commission
DOCKETED

OCT - 4 2018

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ARIZONA CORPORATION COMMISSION

October 4, 2018

**RE: Arizona Energy Modernization Plan (AZEMP) and Clean Resource Energy Standard & Tariff (CREST)
Rulemaking Docket (RU-00000A-18-0284)**

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My Fellow Commissioners:

In voting to have Staff open this new AZEMP and CREST rulemaking docket, I want to thank all of you for coming together and formalizing this initial step toward the first comprehensive energy plan in Arizona since the 1980's. I appreciate all of our participants for their input and hard work over the last several years, including responding to multiple Notice of Inquiries (NOIs) requested by commissioners and Staff. The regulated utilities, Tesla, Vote Solar, Southwest Energy Efficiency Project (SWEET), the Western Grid Group, Western Resource Advocates, Residential Utility Consumer Office (RUCO), forest groups, conservative organizations, and numerous other individual consumers and stakeholder groups deserve special recognition for their hand in moving this forward. Together, we have accomplished much, and I'm glad we have achieved harmony in seeking to move forward with this process.

The history of this process began modestly, with only a few workshops dating as far back as ten years ago, but has arguably become the most monumental progression of public policy at the Commission to-date. Our initial workshops were held to get a foundational understanding of peak demand, the duck curve, and intermittent generation on Arizona's energy system. Senator Frank Pratt, Commissioner Bob Stump, and I lead the charge on these discussions, and numerous stakeholders voiced their input and offered potential solutions, which helped lead to the CREST rules I am refiling today. Commissioners who were present at these workshops recall the unique impression the discussions left in their minds, on just how complex these energy issues are for Arizona. Tesla, for example, told Solar City that net metering was obstructing practical adoption of battery storage in Arizona, while our utilities told the Commission that the Navajo Generating Station (NGS) was an integral part of their long-term plans.

While a comprehensive energy plan may not have been the Commission's original motive, several commissioners in the 2016-timeframe realized after these modest workshops that the energy landscape was dramatically shifting and that the original Renewable Energy Standard & Tariff (REST) rules were in desperate need of modernization. The conversation certainly accelerated when some of the same utilities that said NGS was a part of their long-term plans reversed course and determined that 2,200 MWs of reliable, baseload energy would be taken offline essentially overnight, with a complete and total shutdown to occur in as few as 2 years. The Commission hosted an 8-hour workshop on baseload security to learn what "baseload" really meant, and for the first time in the Commission's history, we denied our utilities' Integrated Resource Plans (IRPs) and put a 9-month moratorium on natural gas investment in an attempt to figure it all out. This moratorium is imperative because it has bought the Commission time to try and adopt a forward-looking energy policy and prevent future stranded assets for Arizona's ratepayers.

It is apparent that over-building of any particular generation by regulated utilities would almost guarantee significant costs incurred for new transmission and pipeline infrastructure and stranded assets on these same resources within our lifetimes. The fact that Arizona hasn't had a comprehensive energy plan since the 1980's only emphasizes the risks we contemplated with respect to these actions, and it is critical that we stop and take a deep look at what the actual energy policy is going to be for the state moving forward. The Commission is unified on

these points, with many votes passing 5 to 0 because it is clear that the IRPs as presented by the utilities favor a significant transition that is counter to this proposed Energy Modernization Plan.

After reviewing the extensive record of discovery surrounding a multitude of energy policies, it is clear that the information gathered needed to be compiled into a comprehensive energy plan for this Commission to consider. After consulting with Staff on how to proceed, I was advised by Utilities Director Elijah Abinah that the best way forward was to “update the REST standards already on the books in our administrative code.”

In January of 2018 the proposed Arizona Energy Modernization Plan (AZEMP) was released with a series of guiding principles and policies that I believed would position our State at the forefront of energy policy in the country, drive us towards a cleaner, more sustainable future, and protect ratepayers for generations to come. In February 2018, Utilities Director Abinah advised that the best way to proceed was to issue a Notice of Inquiry (NOI) to allow the commissioners to pose any questions they had regarding the tenets of the plan.

On February 22, 2018 this NOI was issued with a series of over 175 questions covering a variety of issues in the AZEMP, including forest biomass, energy storage, nuclear power, and electric vehicle charging stations. Upon completion of the NOI response period on April 23, 2018 my staff and I set to work on crafting a formal set of draft rules for the Commission’s review and a possible vote to send to the formal rulemaking process.

Director Abinah specifically requested that these proposed rules be drafted by one or more of the commissioners on his behalf, so that his office would not be burdened with the additional labor while trying to juggle numerous other cases still ongoing at the Commission this year. Both the Legal and Hearings Division Staff were instrumental in assisting in this process. For instance, Deputy Director Sarah Harpring created a rule-drafting outline of the AZEMP for us to follow, and Maureen Scott gave us a copy of the existing REST rule language, which we consulted while drafting the specific rules.

On May 25, members of Staff received a copy of revised draft language to review; on June 1, Commissioner Dunn, his Policy Advisor, and our Chief Legal Counsel received a revised copy of the draft language to review; and on June 8, RUCO received a revised copy of the language to review.

After incorporating feedback from over **50 stakeholders** in the NOI process, Sarah Harpring’s outline, the existing REST rules, revisions from participating members of Staff, RUCO, and our Chief Council, and the policy positions of any commissioner who articulated a clear position on an issue over the last 2 years, we originated the redline language upon which the Commission acknowledged it would now like to move forward. The exact text of the CREST rules I am refiling today incorporate the substantive suggestions and stylistic revisions of Staff and stakeholders with decades of experience in Arizona utilities and rulemaking. They also encapsulate the complexity of the issues the Commission began exploring years ago at its modest beginnings.

I respect all the parties for participating and appreciate them for being a part of this process and contributing to the final language of the rules. The AZEMP and accompanying CREST rules are the conservative and calculated products of the information accumulated in the above dockets and workshops over the last several years, which ultimately combines the following inseparable components: an 80% goal for clean energy, a 3,000 MW goal for energy storage capacity, a 60 MW requirement for biomass generation, a 15% Clean Peak Standard, and a goal to spur electric vehicle (EV) charging stations in the state.

On August 14, 2018, the Commission directed Staff to initiate this Rulemaking docket to evaluate many of the principles highlighted in the AZEMP and begin the formal process as Staff enumerated earlier this year. Hearing Division Director and Deputy Director, Jane Rodda and Sarah Harpring, gave my office a complete map of the rulemaking process in February, and I’d especially like to thank them for their excellent recapitulation of that detailed account for the other commissioners to hear at the Staff Meeting in August. Chairman Forese had asked the Utilities Division several times to provide such a map for the commissioners to review, but to-date the Utilities Division has never docketed such a map. I believe this emphasizes many of the issues at the Commission with

respect to the process to date, and I agree that the process has been at times confusing. Clarifying and improving this process in the future should be a priority for the Commission moving forward.

As I stated in two letters dated June 22 and July 5, and as Jane Rodda and Sarah Harpring reiterated in August, voting on the proposal served as an acknowledgement to the public that the Commission needed a plan and moved the proposed AZEMP and CREST language forward for specific redline discussions. Having formally taken that step, Staff must now prepare a Notice of Proposed Rulemaking (NOPR) for the Commission to review and a Recommended Order and Opinion (ROO) authorizing Staff to file the NOPR with the Secretary of State, which must include a Preamble, Economic Impact Statement, and the exact text of the rules, along with a sufficient evidentiary record and due process to support the rulemaking.

With the hard work and unified commitment of all parties involved, two of these most arduous steps have already been completed. For judicial efficiency and to help alleviate the work for Staff, all of the relevant dockets, workshops, documents, and evidentiary records listed below have been docketed to this Rulemaking Docket on behalf of the Commission, to support proceeding with the exact text of the rules as written, to provide the sufficient evidentiary record upon which they are based, and to finally house all the material in the same location.

Accordingly, I am docketing the proposed CREST rules along with all of the relevant dockets, workshops, documents, and evidentiary records that support the Commission's decision to move forward with these AZEMP and CREST proposals, as highlighted below:

Docket: E-01345A-08-0569; APS for approval of Demand Response Program.
Docket: E-01345A-10-0123; Arizona Public Service Company's Electric Vehicle Filing.
Docket: E-00000V-13-0070; Resource Planning and Procurement in 2013 and 2014.
Docket: E-00000XX-13-0214; Investigation to address EE/DSM cost effectiveness.
Docket: E-00000J-14-0023; Investigation of Value and Cost of Distributed Generation.
Docket: E-00000V-15-0094; Resource planning and procurement.
Docket: E-01345A-15-0182; APS for a ruling relating to its 2016 DSM Implementation plan.
Docket: E-00000J-15-0182; Demand-side management and peak demand reductions.
Docket: E-01933A-15-0239; TEP for approval of its 2016 REST Implementation Plan.
Docket: E-01933A-15-0322; TEP for the establishment of just and reasonable rates.
Docket: E-00000J-15-0347; Inquiry into the rooftop solar industry in Arizona.
Docket: E-01345A-16-0036; APS for a hearing to determine the fair value of the utility property.
Docket: E-01345A-16-0176; APS for a ruling relating to its 2017 DSM Implementation Plan.
Docket: E-00000J-16-0257; Reducing system peak demand costs.
Docket: E-00000Q-16-0289; Review, Modernization and Expansion of the REST.
Docket: E-00000C-17-0039; The Future of the Navajo Generating Station.
Docket: E-00000U-17-0057; Demand-side Management progress reports.
Docket: E-01345A-17-0134; APS for a Ruling relating to its 2018 DSM Implementation Plan.
Docket: E-00000Q-17-0138; The Role of Forest Bioenergy in Arizona.
Docket: E-01933A-17-0250; TEP for approval of its 2018 EE Implementation Plan.
Docket: E-00000Q-17-0293; Evaluating Arizona's current and future baseload security.
Docket: E-00000J-18-0266; Inquiry into Electric Vehicles and Electrification of the Transportation Sector.
Workshop: Energy Efficiency Cost Effectiveness (March 18, 2014)
Workshop: Energy Efficiency Cost Recovery (March 31, 2014)
Workshop: Incorporating Energy Efficiency into Integrated Resource Planning (April 17, 2014)
Workshop: Rooftop Solar Industry (October 14, 2015)
Workshop: Integrated Resource Planning and Emerging Technologies (February 26, 2015)
Workshop: Integrated Resource Plans (July 18, 2016)
Workshop: Reducing System Peak Demand Costs (August 4, 2016)
Workshop: Demand-Side Management and Peak Demand Reduction Programs (November 29, 2016)
Workshop: Integrated Resource Plans (November 29, 2016)
Workshop: Battery Storage Technology (March 20, 2017)
Workshop: Coal Markets (April 6, 2017)
Workshop: REST Review (June 7, 2017)

Workshop: Baseload Security (November 9th, 2017)
Workshop: Forest Bioenergy (December 5, 2017)

While not all commissioners were able to participate in every workshop or read every NOI response, the exact text of the proposed CREST rules followed closely Staff's recommendations to incorporate the interests and priorities that resonate the most with each of our fellow commissioners, both current and prior. Commissioners Olson, Dunn, and Forese, for example, have long supported flexibility and autonomy for electric co-ops: as such, the proposed redlines to R14-2-1814 maintain the existing exemption to co-ops, and the proposed redlines to R14-2-1818 for biomass are written to exempt utilities that deliver under 100,000 MWhs/year. These commissioners also all oppose mandate-type approaches to implementing energy policies: accordingly, the proposed redlines to R14-2-1813 only ask affected utilities to develop compliance plans. Commissioner Burns and former Commissioner Kris Mayes, for example, have long been staunch advocates of emerging technologies and of propping-up residential, customer-based industries: the proposed redlines to R14-2-1813 and R14-2-1821 promote new technologies and allow regulated utilities to count customer-cited energy storage technologies toward their respective long-term goals. Commissioners Forese, Olson, and I have historically opposed carbon taxes and creating new credit frameworks to track and record utility progress on an ongoing basis: accordingly, the proposed redlines to R14-2-1818 for biomass and R14-2-1821 for the Clean Peak Standard use only the existing Renewable Energy Credits (RECs) framework so no new credits would be created. Former Commissioner Little and I have both expressed our views that nuclear generation is essential for the success of any future clean energy mix: as such, the proposed redlines to R14-2-1820 recognize nuclear energy as a clean energy resource. This Commission as a whole agrees that on-peak hours represent the highest costs for residential Arizonans and that reducing peak demand is a priority for the Commission: accordingly, the proposed redlines to R14-2-1821 address peak-demand directly, seeking to lower the cost of storage and bring clean energy to customers' most expensive hours of the day and night. Staff wants to see electric Energy Efficiency (EE) and Gas EE opened for rulemaking: the proposed redlines to R14-2-1811 order Staff to commence these rulemakings within 120 days. Our regulated utilities want flexibility to transition to clean energy according to their own needs and circumstances: the proposed redlines to R14-2-1812 and R14-2-1813 allow the utilities to develop these plans as they see fit within the broader framework of the plan. Finally, Staff wants to exercise a degree of control over the process moving forward: the proposed redlines to R14-2-1811 allow Staff to conduct a recurring review of this plan in a manner it deems most efficient.

Although Chairman Forese said, "the language is concerning," he also received a Word document version of the draft rules 14 days earlier, and we have yet to receive any redline recommendations from him indicating or resolving his concerns. While the proposed language will never be perfect, the CREST rules as written put it all together into a package that addresses pieces every stakeholder had a part in. As I said in January with the original AZEMP announcement, there would be no surprises. I have worked diligently to uphold that principle, so all parties would feel comfortable with the plan as it exists today. There will still be plenty of opportunities for additional stakeholder input and I do believe that directing Staff to proceed with rule making was the most appropriate way to hold meaningful discussions moving forward.

There is more work to be done and valid points for the commission to discuss which call our attention. Commissioners Burns and Dunn want to reconsider amending the Constitution to deregulate the retail electric industry; Staff wants to re-write the Biennial Transmission Assessment (BTA) statutes; Commissioner Olson has concerns with respect to the biomass and EV portions of the AZEMP; and while Commissioner Dunn supports biomass, he also has questions on EV policy not included in the original NOI.

While there are additional policy discussions like these for the Commission to consider, I feel the AZEMP and CREST rules should be put into an NOPR format immediately. The AZEMP was proposed in January, and a vote to move forward with the process did not occur until August. This delay of several months demonstrates that additional conversations have done nothing to improve the specific language or advance the process in moving forward. To-date Staff has made no substantive filing in this new AZEMP & CREST Rulemaking Docket since its opening on August 17, almost two months ago. At the same time, these proposals have received widespread praise and support from a host of stakeholders and industry professionals, including from the Arizona Chamber of Commerce, Nature Conservancy, and RUCO. Clearly the business community, environmental groups, partnering

governmental agencies, impacted utilities, and most notably, ratepayers are hoping for our action in quickly identifying an energy plan for the future.

As each of us continue to embark on our individual journeys to explore various respective policy positions, the process should not be delayed when these issues can run concurrently and as the policy details will be further vetted and discussed throughout the formal rulemaking process. Meaningful debate on the specific redline items is the most productive next step, and we should get there as soon as possible.

The cost of further Commission inaction is too great. We have made significant progress by halting certain utility plant investments without having a comprehensive plan, but that was always intended to be a temporary fix. It is now on us to make real moves towards such a plan. The longer we wait, the greater risk we face of catastrophic wildfires, stranded assets with higher ratepayer costs, uncertainty for business and investment in our state, and the continuing threat of air quality issues. Indeed, the Arizona Department of Environmental Quality (ADEQ) has warned that Arizona could face nearly \$300 million in annual costs should we not address our air quality issues, and formal EV policies like those highlighted in this plan would help. While reasonable minds may disagree on which policies are the best for Arizona, the Commission needs to act and clearly articulate our vision for the future to let stakeholders know where we stand.

The final piece of the AZEMP and CREST rules the commissioners have yet to receive is a financial analysis of the plan on ratepayers. Commissioners Burns, Forese, Olson, and I have all asked for this, and while SWEEP and the Western Resource Advocates estimate that over \$500 million dollars could be saved between now and 2032 if utilities adopt portfolios that emphasize clean energy deployment and energy storage technology, their portfolios are similar, but not identical, to the AZEMP. The Economic Impact Statement Staff will develop as part of its ROO and NOPR filing will likely represent the result of our respective requests. When it appears, we ask that it be shared immediately with the commissioners for their respective review.

Until then, I would ask Staff to please review if this isn't an appropriate place to accelerate the informal process by moving forward with the redline language already provided. It is my feeling that the remaining pieces that lack evidentiary maturity, such as deregulation, net metering, interconnection, and blockchain, should be carved out in the short term and addressed in future rulemaking efforts.

To this point, I would respectfully request that, as Staff moves forward with drafting one or more NOPRs, Staff simultaneously prepare at least one NOPR wherein the CREST rules docketed again today provide the exact text of the rules as written. I also ask Staff to docket a motion in the last IRP docket before the next Open Meeting on October 11, requesting that the Commission consider extending or expiring the natural gas moratorium until Staff's NOPRs have been completed and voted on.

I ask Staff to provide a status update on its progress in drafting the NOPR to-date and on its plan to have my version of the NOPR timely prepared. I ask that Staff be prepared to deliver this status update at the next Open Meeting on October 11.

Due to the volume of the documents, and to conserve Commission resources, the evidentiary record is being provided without 13 additional copies and can be found electronically, here: <http://edocket.azcc.gov/Docket/DocketDetailSearch?docketId=21658#docket-detail-container2>. As seen in the photo included on the next page, 13 copies of the documents included in this filing would be redundant and wasteful.

Sincerely,



Andy Tobin,
Commissioner

E-00000Q-16-0289 REST Modernization

E-00000V-13-0070 E-00000V-15-0094 Resource Planning

E-00000XX-13-0214 Energy Efficiency

Arizona Energy Modernization Plan

One-Page
Introduction
Guiding Principles
Modernization Policies
Appendix A
F.A.Q.
PowerPoint Slides

E-00000Q-17-0293 Baseload Security

E-00000C-17-0039 Future of NGS

Proposed Exact Text of the Rules (CREST)

Proposed Rules
Completed Rule-Drafting Outline w/ Notes

E-00000J-16-0257 Peak Demand

Battery Storage

E-01345A-15-0182 E-01345A-16-0176 E-01933A-15-0239 E-01345A-16-0036 E-01933A-15-0322 APS & TEP Rates, REST, DSM & EE

E-00000J-14-0023 Value of Solar

E-00000J-15-0347 Rooftop Solar

E-01345A-10-0123 EV-Ready Project

E-00000J-18-0266 Electric Vehicles

E-01345A-08-0569 E-01345A-17-0134 E-01933A-17-0250 APS & TEP DSM & EE Plans

E-00000Q-17-0138 Forest Bioenergy

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On this 4th day of October, 2018, the foregoing document was filed with Docket Control as a Correspondence From Commissioner, and copies of the foregoing were mailed on behalf of Andy Tobin, Commissioner - A.C.C. to the following who have not consented to email service. On this date or as soon as possible thereafter, the Commission's eDocket program will automatically email a link to the foregoing to the following who have consented to email service.

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